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COUNSEL FOR DEBTOR  
AND DEBTOR IN POSSESSION  
MODE ELEVEN BANCORP

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF WYOMING**

In re: )  
 )  
MODE ELEVEN BANCORP, ) Chapter 11  
 )  
 )  
 ) Case No. 25-20240  
Debtor in Possession. )

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**STIPULATION WITHDRAWING DEBTOR'S OBJECTION TO PROOF OF  
CLAIM OF NEXO INC.**

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Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), made applicable in this chapter 11 case pursuant to Federal Rules of Bankruptcy Procedure 7041 and 9014(c), debtor and debtor in possession Mode Eleven Bancorp (the "Debtor") and Nexo Inc. ("Nexo") stipulate to the withdrawal of the Debtor's objection (Dkt. 211) (the "Claim Objection") to Proof of Claim No. 4 filed by Nexo (the "SRA Claim") as follows:

**WHEREAS**, Nexo filed the SRA Claim on August 8, 2025, and subsequently

amended it on November 7, 2025;

**WHEREAS**, the Debtor filed the Claim Objection on November 5, 2025;

**WHEREAS**, Nexo filed a response to the Claim Objection on December 8, 2025 (Dkt. 231);

**WHEREAS**, no party other than the Debtor and Nexo has appeared with respect to the Claim Objection;

**WHEREAS**, on December 29, 2025 the Court entered an *Order Vacating Hearing on Debtor's Objection to Claim No. 4 Filed by Nexo Inc. and the Response Filed Thereto* (Dkt. 242);

**WHEREAS**, on January 20, 2026 the Court entered an *Order Granting Motion of Debtor and Debtor in Possession Mode Eleven Bancorp for an Order Approving Compromise of Controversy with Nexo Inc. Pursuant to Federal Rule of Bankruptcy Procedure 9019* (Dkt. 267) which approved that certain Settlement Agreement between the Debtor and Nexo dated December 12, 2025 (the "Settlement Agreement");

**WHEREAS**, the Settlement Agreement provides, among other things, that Nexo shall amend the SRA Claim to reduce the amount of the SRA Claim to \$1,000,000;

**WHEREAS**, Nexo amended the SRA Claim in accordance with the Settlement Agreement on February 6, 2026; and

**WHEREAS** the Settlement Agreement further provides that within three business days after Nexo amends the SRA Claim, the Debtor shall withdraw the Claim Objection;

Now, therefore, the Debtor and Nexo hereby stipulate to withdrawal of the Claim Objection pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

Dated: February 9, 2026

/s/ Abigail V. O'Brient

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